

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

SHEILA PORTER,

Plaintiff,

V.

ANDREA CABRAL, ET AL.,

Defendants.

CIVIL ACTION
NO. 04-11935-DPW

PROPOSED MODIFICATION OF PROTECTIVE ORDER

Pursuant to the Court's order of September 28, 2005, Globe Newspaper Company, Inc. (the "Globe") respectfully submits as Exhibit A hereto a proposed Modification to Protective Order. The proposed Modification has been served on the parties in advance of filing and no party proposed any changes to the attached form of order.

OF COUNSEL:

David E. McCraw, Esq.
The New York Times Company
 229 West 43rd Street
 New York, NY 10036
 (212) 556-4031

GLOBE NEWSPAPER COMPANY, INC.,

By its attorneys,

/s/Jonathan M. Albano
Jonathan M. Albano, BBO#013850
BINGHAM MCCUTCHEN LLP
150 Federal Street
Boston, MA 02110-1726
(617) 951-8000

Dated: October 10, 2005